UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
CODE200, UAB; TESO LT, UAB; METACLUSTER LT, UAB OXYSALES, UAB; AND CORETECH LT, UAB,
Petitioners
V.
BRIGHT DATA LTD.,

\_\_\_\_\_

Patent Owner

Case IPR2021-01492

Patent No. 10,257,319

PATENT OWNER'S NOTICE OF FILING DEMONSTRATIVE EXHIBITS

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450



PATENT OWNER'S LIST OF EXHIBITS		
EX. 2001	Jury Verdict, <i>Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.</i> , No. 2:19-cv-395-JRG, Dkt. 516 (E.D. Tex. Nov. 5, 2021)	
EX. 2002	Plaintiff Bright Data Ltd.'s Disclosure of Proposed Claim Terms for Construction, dated December 8, 2021, in the case of <i>Bright Data Ltd. v. NetNut Ltd.</i> , Case No. 2:21-cv-225-JRG (E.D. Tex.)	
EX. 2003	Docket Control Order, <i>Bright Data Ltd. v. NetNut Ltd.</i> , Case No. 2:21-cv-225-JRG, Dkt. 56 (E.D. Tex. Oct. 22, 2021)	
EX. 2004	Order on Pretrial Motions and Motions in Limine, Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al., No. 2:19-cv-395-JRG, Dkt. 476 (E.D. Tex. Sept. 9, 2021)	
EX. 2005	Applicant Remarks, dated October 18, 2018, regarding Application No. 15/957,945 which issued as Patent No. 10,257,319 (previously submitted in IPR2020-01266 as EX. 2008)	
EX. 2006	Declaration of Dr. V. Thomas Rhyne (previously submitted in IPR2020-01266 as EX. 2012)	
EX. 2007	Plaintiff's Sur-reply in opposition to Defendants' Motion to Dismiss, Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al., No. 2:19-cv-395-JRG, Dkt. 47 (E.D. Tex. May 5, 2020)	
EX. 2008	Order, Boxcast Inc., v. Resi Media LLC, et al., No. 2:21-cv-217-JRG, Dkt. 55 (E.D. Tex. Dec. 1, 2021)	
EX. 2009	Order, Oyster Optics, LLC v. Infinera Corp., et al., No. 2:19-cv-257-JRG, Dkt. 87 (E.D. Tex. July 17, 2020)	
EX. 2010	Declaration of Mr. Thomas M. Dunham	



EX. 2011	Order, <i>Uniloc USA</i> , <i>Inc. v. Ringcentral</i> , <i>Inc.</i> , No. 2-17-cv-354, Dkt. 100 (E.D. Tex. Feb. 12, 2018)
EX. 2012	Motion, Uniloc USA, Inc. v. Ringcentral, Inc., No. 2-17-cv-354, Dkt. 97 (E.D. Tex. Feb. 8, 2018)
EX. 2013	Order, Uniloc USA, Inc. v. Ringcentral, Inc., No. 2-17-cv-354, Dkt. 99 (E.D. Tex. Feb. 9, 2018)
EX. 2014	Joint Motion, Bright Data Ltd. v. NetNut Ltd., No. 2:21-cv-225, Dkt. 79 (E.D. Tex. Dec. 22, 2021)
EX. 2015	Motion, <i>Bright Data Ltd. v. NetNut Ltd.</i> , No. 2:21-cv-225, Dkt. 80 (E.D. Tex. Dec. 23, 2021)
EX. 2016	Letter, dated Dec. 30, 2021, from Bright Data Ltd. to NetNut Ltd. regarding the scheduling of depositions in the case of <i>Bright Data Ltd. v. NetNut Ltd.</i> , No. 2:21-cv-225 (E.D. Tex.)
EX. 2017	Declaration of Mr. Thomas M. Dunham
EX. 2018	Order, <i>Bright Data Ltd.</i> v. <i>NetNut Ltd.</i> , No. 2:21-cv-225, Dkt. 153 (E.D. Tex. May 17, 2022)
EX. 2019	Settlement Agreement between Bright Data Ltd. and NetNut Ltd. – BOARD ONLY (as of December 7, 2022)
EX. 2020	Declaration of Robert M. Harkins
EX. 2021	Claim Construction Order (Dkt. 146) in the case of Bright Data Ltd. v. NetNut Ltd., Case No. 2:21-cv-00225 (E.D. Tex. May 10, 2022)
EX. 2022	Order, Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Code200, UAB, et al., Case No. 2:19-cv-396-JRG, Dkt. 97 (E.D. Tex. Feb. 8, 2021)
EX. 2023	Order, Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Code200, UAB, et al., Case No. 2:19-cv-396-JRG, Dkt. 98 (E.D. Tex. Feb. 9, 2021)



EX. 2024	Order, Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al., Case No. 2:19-cv-395-JRG, Dkt. 303 (E.D. Tex. Feb. 12, 2021)
EX. 2025	Patent No. 10,069,936
EX. 2026	Prosecution History of Patent No. 10,069,936
EX. 2027	U.S. Patent No. 10,491,713
EX. 2028	U.S. Patent No. 11,050,852
EX. 2029	U.S. Patent No. 10,484,510
EX. 2030	Definition "Consumer", Cambridge English Dictionary; accessed at https://dictionary.cambridge.org/us/dictionary/english/consumer on June 10, 2022
EX. 2031	Definition "Consumer", Cambridge Advanced Learner's Dictionary, copyright 2008, ISBN 978-0-521-71266-8
EX. 2032	Definition "Consumer", Cambridge Academic Content Dictionary, copyright 2009, ISBN 978-0-521-69196-3
EX. 2033	Definition "Consumer", Collins English Dictionary; accessed at https://www.collinsdictionary.com/us/dictionary/english/consumer on June 10, 2022
EX. 2034	Definition "Consumer", Collins COBUILD Advanced Dictionary of American English, copyright 2007, ISBN 978-1-4240-0363-1
EX. 2035	Network Fundamentals Study Guide, published February 17, 2015; accessed at https://www.webopedia.com/reference/network-fundamentals-studyguide/#topologies on June 14, 2022
EX. 2036	Excerpts from Tanenbaum, A., et al., "Computer Networks – Fifth Edition", copyright 2011, ISBN 0-13-212695-8



EX. 2037	Excerpts from Tanenbaum, A, "Computer Networks – Fourth Edition", copyright 2003, ISBN 0-13-066102-3
EX. 2038	Bright Data, "Residential Proxy Network", accessed at https://brightdata.com/proxy-types/residential-proxies on July 29, 2022
EX. 2039	Bright Data, Network Diagram – HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS' EYES ONLY
EX. 2040	Appendix to Declaration of Dr. Tim A. Williams
EX. 2041	Source Code File 1 of 4 - HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS' EYES ONLY – SOURCE CODE
EX. 2042	Source Code File 2 of 4 - HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS' EYES ONLY – SOURCE CODE
EX. 2043	Source Code File 3 of 4 - HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS' EYES ONLY – SOURCE CODE
EX. 2044	Source Code File 4 of 4 - HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS' EYES ONLY – SOURCE CODE
EX. 2045	EMK Capital, "EMK acquires Luminati", published August 10, 2017; accessed at https://www.emkcapital.com/emk-acquires-luminati-worlds-largest-ip-proxy-network-brings-transparency-internet/ on July 29, 2022
EX. 2046	Frost & Sullivan Report, "Global IP Proxy Networks Market," published July 2019
EX. 2047	Excerpts from Trial Transcript, Day 3 in the case of Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al., Case No. 2:19-cv-00395 (E.D. Tex. Nov. 3, 2021)
EX. 2048	Bright Data, "Proxy Services", accessed at https://brightdata.com/proxy-types on July 29, 2022



# DOCKET A L A R M

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

### **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

#### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

### **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

